

# **Exhibit 7**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

\* \* \* \* \*  
STEPHEN BECKMAN, \*  
Plaintiff \*  
VS. \* CIVIL ACTION  
BULL HN INFORMATION SYSTEMS, \* NO. 03-12567-NG  
INC., \*  
Defendant \*  
\* \* \* \* \*

**DEPOSITION OF FRANK GOMEZ**, called by the Defendant, taken pursuant to the applicable provisions of the Federal Rules of Civil Procedure, before Ruth E. Hulke, Certified Shorthand Reporter No. 114893 and Notary Public for the Commonwealth of Massachusetts, at Wilmer, Cutler, Pickering, Hale and Dorr, LLP, 60 State Street, Boston, Massachusetts, on Monday, April 11, 2005, commencing at 9:12 a.m.

APPEARANCES:

JOAN A. LUKEY and KELLY S. BLACK-HOLMES, ESQS., of Wilmer, Cutler, Pickering, Hale and Dorr, LLP, 60 State Street, Boston, Massachusetts, 02109, on behalf of the Defendant.

NANCY L. EDGREN, ESQ., of Barron & Stadfeld, P.C., 100 Cambridge Street, Suite 1310, Boston, Massachusetts, 02114, on behalf of the Plaintiff.

ALSO PRESENT: Kurt Ogle, Esq., Senior Counsel, Bull HN Information Systems, Inc.

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Hearings ♦ Conferences ♦ Legal Proceedings

1           A.     It was closer to, you know, getting laid off.  
2     That's all I -- The economy was weak at the time and  
3     profits were down, and they always used to tell us they  
4     never made a profit. It's hard to believe, but.

5           Q.     Who told you that?

6           A.     Well, we would get, you know, when we have our  
7     annual review, they would tell us, you know, we're, like,  
8     number one or two or three behind other companies and  
9     there was no profit this year or something. I don't  
10    know.

11          Q.     Do you remember over what period of time you  
12    were being told at your annual review that Bull was not  
13    realizing a profit?

14          A.     I would say the last four or five years when  
15    everything was declining. Sometimes on the floor, when  
16    you're on the floor you can see things going and you hear  
17    things, but then you don't -- you know, when they do tell  
18    you what you heard was true, you know.

19          Q.     Did you personally observe at some point that  
20    there was a decline in the work to be done?

21          A.     Yes.

22          Q.     When did you first observe that?

23          A.     I would say 1993, '94, something like that.

1 Q. And what was it that you observed? Was it that  
2 there was less being assembled, less being shipped, or  
3 both?

4 A. There was both. Less being shipped, less being  
5 assembled, a lot of down time on the floors. The  
6 atmosphere wasn't, you know, too great. It was kind of,  
7 people weren't too happy with what was going on.

8 Q. When did that start, this atmosphere problem?

9 A. About the same time.

10 Q. About '93?

11 A. Yeah.

12 Q. Did you learn at some point that GCOS 6 was  
13 actually shutting down that product line?

14 A. Yeah. We were told it was shutting down, yes.

15 Q. Do you remember when that was?

16 A. I would say, I think around '92, '93, was when  
17 I think it was going to phase out, or something like  
18 that. I'm not positive.

19 Q. Did any other line come in; that is, did you  
20 begin manufacturing any other Bull line or assembling it?

21 A. They were going big on -- When we were getting  
22 close to getting laid off, they were going big on boards,  
23 for manufacturing boards for other companies.